

FILED

NOV 13 2013

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LORENZO TATE, aka TRE  
DAMITRIUS CREIGHTON, and  
MARQUISE JONES,

Defendants.

4:13CR477 RWS/NAB

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, and up to and including August 29, 2012, with the exact dates unknown, within the Eastern District of Missouri,

**LORENZO TATE, aka TRE,  
DAMITRIUS CREIGHTON, and  
MARQUISE JONES,**

the defendants herein, and other persons known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate and agree to commit an offense against the United States; to wit: to obstruct, delay, and affect commerce and the movement of any article or commodity in commerce by robbery, in that the defendants did unlawfully plan to take kilograms of cocaine, a Schedule II controlled substance, from the person or in the presence of another, against his will, by means of actual force, violence, and fear of injury to his person.

**Overt Acts**

In furtherance of said conspiracy and to achieve the objectives and purposes thereof, the defendants and other persons known and unknown to the Grand Jury committed and caused the commission of the following overt acts in the Eastern District of Missouri and elsewhere:

1. On or about August 17, 2012, co-conspirator Arlando Quarles attended a meeting and planned to rob and kill armed Mexican drug dealers of approximately 13 kilograms of cocaine intended to be transported to Chicago, Illinois.
2. On or about August 17, 2012, co-conspirator Arlando Quarles attended a meeting and planned to distribute, and to divide among the conspirators, the cocaine.
3. On or about August 20, 2012, defendant Lorenzo Tate and co-conspirators attended a meeting and planned to obtain firearms to conduct the robbery and kill the Mexican drug dealers.
4. On or about August 20, 2012, defendant Lorenzo Tate and co-conspirators attended a meeting and planned to distribute, and to divide among the conspirators, the cocaine.
5. On or about August 27, 2012, defendant Lorenzo Tate and co-conspirator Arlando Quarles attended a meeting and planned to conduct the robbery on August 29, 2012, at which time they would shoot and kill the armed Mexican drug dealers.
6. On or before August 29, 2012, defendants Lorenzo Tate, Demetrius Creighton, Marquise Jones, and others obtained firearms and ammunition to facilitate the conspiracy.
7. On or about August 29, 2012, defendants Lorenzo Tate, Demetrius Creighton, Marquise Jones, and others arrived on the parking lot at 6155 South Grand, in the City of St. Louis, to facilitate the conspiracy.

8. On or about August 29, 2012, defendants Lorenzo Tate, Demetrius Creighton, Marquise Jones, and others possessed loaded semi-automatic pistols and various rounds of ammunition in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 1951(a), and punishable under Title 18, United States Code, Section 1951(a).

**COUNT TWO**

The Grand Jury further charges that:

On or about August 29, 2012, in the City of St. Louis, within the Eastern District of Missouri,

**LORENZO TATE, aka TRE,  
DAMITRIUS CREIGHTON, and  
MARQUISE JONES,**

the defendants herein, did knowingly possess one or more firearms in furtherance of a crime of violence which may be prosecuted in a court of the United States; to wit: conspiracy to obstruct, delay, and affect commerce and the movement of any article or commodity in commerce by robbery of kilograms of cocaine, as charged in Count One herein.

In violation of Title 18, United States Code, Section 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT THREE**

The Grand Jury further charges that:

On or about August 29, 2012, in the City of St. Louis, within the Eastern District of Missouri,

**LORENZO TATE, aka TRE,  
DAMITRIUS CREIGHTON, and  
MARQUISE JONES,**

the defendants herein, who at the time in question were juveniles who had not attained the age of 18 years, did knowingly possess one or more handguns and various rounds of ammunition that are suitable for use only in a handgun, all of which traveled in interstate or foreign commerce during or prior to being in the defendants' possession.

In violation of Title 18, United States Code, Section 922(x)(2).

**COUNT FOUR**

The Grand Jury further charges that:

On or about April 2, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**MARQUISE JONES,**

the defendant herein, who at the time in question was a juvenile who had not attained the age of 18 years, did knowingly possess a handgun, which traveled in interstate or foreign commerce during or prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(x)(2).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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